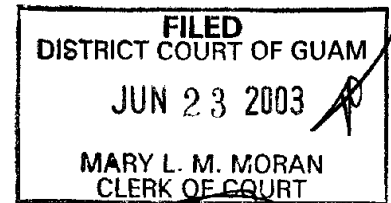


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Counsel for Plaintiffs LOUIS VUITTON
MALLETIER, CHANEL, INC. and
PRADA, S.A.



UNITED STATES DISTRICT COURT OF GUAM

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

LOUIS VUITTON MALLETIER and
CHANEL, INC., and PRADA, S.A.

Plaintiffs,

vs.

HANA TRADE CORPORATION dba
HONOLULU GIFT SHOP aka U.S.A. T-
SHIRTS AND GIFT ITEMS, VENDOR
DOE II aka SU KIM, VENDOR DOE
III, KIM CHOL KUN dba ANGELUS,
VENDOR DOE IV aka LISA'S,
VENDOR DOE V aka FASHION CITY,
VENDOR DOE VI aka CORALYN'S
VARIETIES, VENDOR DOE VII and
DOES I THROUGH XX,

Defendants.

CIVIL CASE NO. 03-00013

**DECLARATION OF ANITA P. ARRIOLA
IN SUPPORT OF PLAINTIFFS'
VERIFIED FIRST AMENDED
COMPLAINT AND PLAINTIFFS'
SECOND MOTION FOR TEMPORARY
RESTRAINING ORDER, SEIZURE
ORDER, ORDER TO SHOW CAUSE FOR
PRELIMINARY INJUNCTION, ORDER
SEALING FILE AND ORDER
ACCELERATING DISCOVERY;
CERTIFICATE OF COUNSEL
(L.R. 7.1(j))**

I, **ANITA P. ARRIOLA**, being duly sworn, declare and state as follows:

1. I am counsel for plaintiff in the above-captioned matter. I file this Declaration in support of Plaintiffs' Second Ex Parte Application for Temporary Restraining Order, Seizure Order, Order to Show Cause for a Preliminary Injunction, Order Sealing File and Order Accelerating Discovery. I have personal knowledge of the facts contained herein.

ORIGINAL

2. I respectfully request that the Court incorporate herein my previous declaration filed in this matter on May 5, 1995 in support of the Plaintiffs' application for ex parte orders, as the facts in my previous declaration also apply to the Plaintiffs' second request for ex parte orders.

3. On May 13, 2003, this Court issued a Temporary Restraining Order, Seizure Order, and Order to Show Cause for Preliminary Injunction, Order Sealing File and Order Accelerating Discovery against Defendants VENDOR DOE I, aka HANA TRADE CORPORATION dba HONOLULU GIFT SHOP aka U.S.A. T-SHIRTS AND GIFT ITEMS, VENDOR DOE II, aka SU KIM, VENDOR DOE III aka KIM CHOL KUN dba ANGELUS. During the further course of my investigation of other businesses who have engaged in selling counterfeit merchandise, additional defendants, namely VENDOR DOE IV aka LISA'S, VENDOR DOE V aka FASHION CITY, and VENDOR DOE VI aka CORALYN'S VARIETIES have been identified.

4. I have not notified Attorney Mun Su Park, attorney for KIM CHOL KUN dba ANGELUS of this second ex parte application due to the fact that he may alter the three new defendants of this application and plaintiffs' attempt to seize the counterfeit goods. I am not aware of the names of the attorneys of the remaining defendants in this action and, accordingly, have not notified any other attorneys of this ex parte application.

5. As required by 15 U.S.C. § 1116, I have given notice of this application for an ex parte order to the United States Attorney for the District of Guam by letter dated June 9, 2003. A true and correct copy of this notice is attached hereto as Exhibit A.

6. To the best of my knowledge, no prior application by plaintiffs for similar relief against defendants VENDOR DOE IV aka LISA'S, VENDOR DOE V aka FASHION CITY and VENDOR DOE VI aka Coralyn's Varieties, and VENDOR DOE VII has been made. A prior

application against Defendant VENDOR DOE II, aka SU KIM has been made. Upon information and belief, the Temporary Restraining Order issued on May 13, 2003 was not served upon VENDOR DOE II, aka SU KIM because she could not be located.

7. On May 19, 2003, attorneys Joaquin C. Arriola, Jr. and Jacqueline T. Terlaje, accompanied several U.S. marshals to Fort Apugan park in an attempt to serve the Temporary Restraining Order, Seizure Order, and Order to Show Cause for Preliminary Injunction, Order Sealing File and Order Accelerating Discovery issued on May 13, 2003. However, I am informed that Defendant VENDOR DOE II aka Su Kim could not be found. During the course of further attempts to determine the identity of Vendor Doe II, I have been informed that Su Kim was off-island in Korea during the time the U.S. marshals attempted to serve the orders.

8. I have attempted to determine the true identity of the defendants engaged in selling counterfeit merchandise in this case. I have been informed by representatives at the Guam Department of Revenue & Taxation that they are unable to locate a business name or business license for the company or individuals selling items at the Dededo Mall by the name of "Lisa's". Accordingly, they are sued as VENDOR DOE IV aka LISA'S.

9. I have further attempted to determine the true identity of VENDOR DOE V aka FASHION CITY. I have been informed by representatives at the Guam Department of Revenue & Taxation that they are unable to locate a business name or business license for the company or individuals selling items at the Dededo Mall by the name of "Fashion City."

10. I have attempted to determine the true identity of VENDOR DOE VI aka "Coralyn's Varieties." I have been informed by representatives at the Guam Department of Revenue & Taxation that they are unable to locate a business name or business license for the company or individuals selling items at Dededo Mall by the name of "Coralyn's Varieties."

11. I have been unable to determine the true identity of VENDOR DOE VII, an unnamed and unmarked business in the indoor swap meet area of the Dededo Mall, Dededo, Guam.

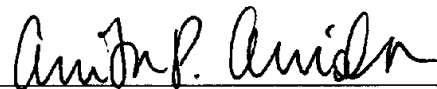
12. Plaintiffs have not publicized this action.

13. An order accelerating discovery is also vital in this case.

14. Plaintiffs have previously posted \$5,000.00 as a security bond for issuance of the temporary restraining and seizure order. Plaintiffs submit that this amount is also sufficient to cover the three additional defendants.

I declare under penalty of perjury under the laws of the United States and the territory of Guam that the foregoing is true and correct.

Executed this 23rd day of June, 2003 in Hagatna, Guam.



ANITA P. ARRIOLA

RECEIVED
U.S. ATTORNEY'S OFFICE
JUN 23 11 08 AM '03

LAW OFFICES

Arriola, Cowan & Arriola

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June 20, 2003

CONFIDENTIAL - VIA HAND DELIVERY

Karon Johnson, Esq.
United States Attorney
Office of the United States Attorney
108 Hernan Cortes Avenue, Suite 500
Hagatña, Guam 96910

Re: LOUIS VUITTON MALLETIER, et al. vs. VENDOR DOE I aka U.S.A. T-Shirts
and Gift Items, et al.

Dear Ms. Johnson:

This firm has been retained by Louis Vuitton Malletier, Chanel Inc. and Prada, S.A. manufacturers of the signature and distinctive brands of luggage, purses, bags, accessories, jewelry and other items bearing the LOUIS VUITTON, CHANEL and PRADA trademarks, to protect their trademarks in this district. It is our intention to bring suit against certain entities and individuals who are selling, or offering for sale, counterfeit LOUIS VUITTON, CHANEL and PRADA goods in the near future.

The prospective defendants are VENDOR DOE IV aka LISA'S, VENDOR DOE V aka FASHION CITY, VENDOR DOE VI aka CORALYN'S VARIETIES, operating stores at the Dededo Mall and any related individuals or companies, along with their officers and directors.

As you know, under the Trademark Counterfeiting Act of 1984, we are required to give notice to the United States Attorney of our intent to seek an ex parte seizure order under amendments to the Lanham Act by that legislation. If we do not receive word from your office of objections to our intent to request for such relief we will deem that your office has no objections. Should you have any questions or concerns, do not hesitate to contact me.

Very truly yours,

Anita P. Arriola
ANITA P. ARRIOLA

cc: U. S. Customs Service

